

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.) Cr. No. 18-03495 JCH
)
DOUGLAS D. SMITH,)
)
Defendant.)

UNITED STATES' EXHIBIT LIST

The United States respectfully submits the following list of anticipated exhibits which may be used at trial and requests permission to amend such list to include additional exhibits as may become necessary prior to and during trial.

1. Recording of Defendant's May 5, 2018 phone call to 911
2. Transcript of recording of Defendant's May 5, 2018 phone call to 911
3. Recording of Defendant's May 5, 2018 statement to Espanola Police Department (EPD) Officer Albert Rael
4. Transcript of recording of Defendant's May 5, 2018 statement to EPD Officer Albert Rael
5. Recording of Defendant's May 5, 2018 statement to EPD Detective Byron Abeyta
6. Transcript of recording of Defendant's May 5, 2018 statement to EPD Detective Byron Abeyta
7. Photograph of Motel from street with M.G. – Bates 78
8. Photograph of M.G. with light and trailer – Bates 84
9. Photograph of trailer side view – Bates 89

10. Photograph of front gate – Bates 92
11. Photograph of Defendant's front yard – Bates 95
12. Photograph of Defendant's front door area – Bates 96
13. Photograph of gun marked #1 – Bates 100
14. Photograph of two spent bullets marked #2 and #3 (close up) – Bates 102
15. Photograph of spent bullet marked #4 – Bates 116
16. Photograph of spent bullet marked #5 – Bates 117
17. Photograph of M.G. – Bates 105
18. Photograph showing blood loss – Bates 111
19. Photograph showing injury – Bates 112
20. Photograph showing injury to face – Bates 114
21. Photograph showing injury to forehead – Bates 115
22. Diagram Defendant drew in May 5, 2018 interview with Detective Abeyta –
Bates 27
23. Photograph of trailer and blood stain – Bates 136
24. Photograph of trailer and front yard – Bates 137
25. Photograph of bullet hole in trailer (close up) – Bates 124
26. Photograph of bullet hole – Bates 125
27. Photograph of metal shed behind trailer in background – Bates 127
28. Photograph of bullet hole in metal shed (close up) – Bates 130
29. Recording of Defendant's May 7, 2018 statement to FBI agents
30. Transcript of recording of Defendant's May 7, 2018 statement to FBI agents
31. Diagram Defendant drew in May 7, 2018 interview with FBI agents – Bates 7

32. Photograph of M.G. at the scene – Bates 624
33. Photograph of M.G. and foliage – Bates 634
34. Photograph of M.G. and blood stain – Bates 643
35. Photograph of Motel rooms front view – Bates 657
36. Photograph of gunshot entry – Bates 709
37. Photograph of gunshot entry (close up) – Bates 710
38. Photograph of bullet fragment retrieved from M.G. – Bates 726
39. Photograph of M.G.’s face showing injuries after cleaning – Bates 781
40. Spherical photograph of Defendant’s yard facing gate – Bates 832
41. Spherical photograph of Defendant’s door – Bates 836
42. Spherical photograph of Defendant’s yard facing wooden shed – Bates 840
43. Spherical photograph of Defendant’s yard facing gate – Bates 841
44. Spherical photograph of Defendant’s yard facing wooden shed – Bates 900
45. Spherical photograph of Defendant’s yard facing wooden shed – Bates 912
46. Photograph of Motel with private property sign – Bates 979
47. Photograph of Motel with sign and fence – Bates 980
48. Photograph of door of room #6 at Motel – Bates 1029
49. Photograph of side gate with sign – Bates 1030
50. Photograph of Motel with address number – Bates 1037
51. Photograph of bullet hole in trailer marked H1 – Bates 1331
52. Photograph of bullet hole in trailer marked H1 (close up) – Bates 1333
53. Photograph of metal shed with bullet hole – Bates 1163
54. Photograph of bullet hole marked H2 – Bates 1165

55. Photograph of bullet impact in metal shed marked I1 – Bates 1179
56. Photograph of bullet hole in television marked I1 (close up) – Bates 1184
57. Photograph of Defendant's yard facing Motel rooms – Bates 1376
58. Photograph of Defendant's yard with wooden shed – Bates 1413
59. Aerial video of Motel
60. Demonstrative aid – 3D model of Motel and Defendant's yard
61. Trajectory diagram – Bates 1469
62. Pueblo of Santa Clara enrollment letter for M.G. – Bates 159

Respectfully submitted,

JOHN C. ANDERSON
United States Attorney

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I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will cause a copy of this filing to be sent to counsel for Defendant.

/s/

NOVALINE D. WILSON
Assistant United States Attorney